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19 Attorneys *Specially Appearing* for Defendants
20 AXUS STATIONARY (HONG KONG) LTD.,
21 ANDRE VIEGAS, HIGHTON LTD., ROBERTA
22 TRADING CORPORATION and KENPARK LTD

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PRODUCTS AND VENTURES
INTERNATIONAL,

Plaintiff,

v.

AXUS STATIONARY (SHANGHAI)
LTD., AXUS STATIONARY (HONG
KONG) LTD., SHANGHAI MARCO
STATIONARY CO. LTD., SHANGHAI
LAIKESHENG PEN MATERIAL CO.
LTD. d/b/a/ SHANGHAI LEXON,
PEIFENG XU, ANDRE VIEGAS,
HIGHTON LTD., ROBERTA TRADING
CORPORATION, and KENPARK LTD.

Defendants.

Case No.: 3:16-CV-669

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

[SPECIAL APPEARANCE]

STIPULATION FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT –
CASE NO. 3:16-CV-669

Defendants Axus Stationary (Hong Kong) Ltd., Andre Viegas, Highton Ltd., Roberta Trading Corporation and Kenpark Ltd. (collectively, "the Defendants") hereby specially appear in the above-captioned case for the limited purpose of filing this Stipulation for Extension of Time to Respond to Complaint. The Defendants' special and limited appearance is not intended, and shall not be construed, as a waiver of any of the Defendants' rights to challenge the jurisdiction of this Court or the sufficiency of service in this matter.

The Defendants and plaintiff Products and Ventures International have met and conferred and state the following:

Whereas, the Defendants have requested an extension of time for the Defendants to respond to the complaint in the above-captioned action and the plaintiff is willing to accommodate that request;

Therefore, pursuant to Civil Local Rule 6-1(a), the plaintiff and the Defendants, by and through their respective counsel, hereby stipulate and agree that the Defendants shall have an extension of time up to and including April 18, 2016 in which to respond to the complaint in this action.

IT IS SO STIPULATED.

Dated: March 21, 2016

GAW POE LLP

By: /s/ Randolph Gaw

Randolph Gaw
Attorneys for Plaintiff
PRODUCTS AND VENTURES
INTERNATIONAL

Dated: March 21, 2016

HOGAN LOVELLS US LLP

Dated: 3/22/16

By: /s/ Mark C. Goodman

Mark C. Goodman
Attorneys **Specially Appearing** for Defendants
AXUS STATIONARY (HONG KONG)
LTD., ANDRE VIEGAS, HIGHTON LTD.,
ROBERTA TRADING CORPORATION and
KENPARK LTD

